

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

SONOS, INC.,

§

Plaintiff,

§

v.

§

GOOGLE LLC,

§

Defendant.

§

NO. 6:20-cv-00881-ADA

JURY TRIAL DEMANDED

JOINT CLAIM CONSTRUCTION STATEMENT

TO THE HONORABLE COURT:

Pursuant to the scheduling orders in these cases, the Parties jointly submit this claim construction statement.

Disputed Terms		
Claim Term/Phrase	Plaintiff's Construction	Defendant's Construction
“multimedia” [’206 and ’615 Patents] [Proposed by Sonos]	“any type of media that comprises audio (including audio alone)”	Plain and ordinary meaning; no construction necessary.

Disputed Terms		
Claim Term/Phrase	Plaintiff's Construction	Defendant's Construction
“network interface” [’206, ’615, ’885 Patents] [Proposed by Sonos]	“a physical component of a device that provides an interconnection with a data network”	Plain and ordinary meaning; no construction necessary
“playback device” [’206, ’615, ’033 Patents] “zone player” [’966 and ’885 Patents] [Proposed by Sonos]	“a data network device configured to process and output audio”	Plain and ordinary meaning; no construction necessary
“zone configuration characterizes one or more zone scenes” [’206 Patent] [Proposed by Sonos]	“configuration data that provides an indication of one or more zone scenes”	No separate construction proposed. <i>See</i> “zone” and “zone scene” terms
“zone” [’206 Patent] [Proposed by Google]	No separate construction necessary.	“an area or areas with one or more playback devices”
“zone scene” [’206 Patent] [Proposed by Google]	No separate construction necessary; <i>see</i> below construction for term in context.	“a group of two or more zones that are grouped according to a common theme by configuring the zones in a particular scene (e.g., morning, afternoon or garden)”

Disputed Terms		
Claim Term/Phrase	Plaintiff's Construction	Defendant's Construction
<p>“zone scene identifying a group configuration associated with two or more of the plurality of independent playback devices”</p> <p>[’206 Patent]</p> <p>[Proposed by Sonos]</p> <p>“[first / second] zone scene comprising a [first / second] predefined grouping of zone players including at least the first zone player and a [second / third] zone player that are to be configured for synchronous playback of media when the [first / second] zone scene is invoked”</p> <p>[’966 and ’885 Patents]</p> <p>[Proposed by Sonos]</p>	<p>“a previously-saved grouping of [independent playback devices / zone players] that are to be configured for synchronous playback of media when the zone scene is invoked”</p>	<p>No separate construction proposed. See “zone” and “zone scene” terms.</p>
<p>“group configuration”</p> <p>[’206 Patent]</p> <p>[Proposed by Google]</p>	<p>No separate construction necessary.</p>	<p>Indefinite</p>
<p>“causing the selectable indication of the at least one of the one or more zone scenes to be displayed”</p> <p>[’206 Patent]</p> <p>[Proposed by Google]</p>	<p>Plain and ordinary meaning; no construction necessary.</p>	<p>Indefinite</p>

Disputed Terms		
Claim Term/Phrase	Plaintiff's Construction	Defendant's Construction
“local area network” [’615 Patent] [Proposed by Sonos]	“data network that interconnects devices within a limited area, such as a home or office”	Plain and ordinary meaning; no construction necessary.
“cloud” [’615 and ’033 Patents] [Proposed by Google]	Plain and ordinary meaning; no construction necessary.	“over a network”
“a media particular playback system” [’615 Patent] [Proposed by both Parties]	“a media playback system”	Indefinite
“data network” [’966, ’033, ’885 Patents] [Proposed by Sonos]	“a medium that interconnects devices, enabling them to send digital data packets to and receive digital data packets from each other”	Plain and ordinary meaning; no construction necessary.
“remote playback queue” [’966, ’033, ’885 Patents] [Proposed by Google]	Plain and ordinary meaning; no construction necessary.	“remote playback queue provided by a third party application”

Disputed Terms		
Claim Term/Phrase	Plaintiff's Construction	Defendant's Construction
<p>“an instruction for the at least one given playback device to take over responsibility for playback of the remote playback queue from the computing device, wherein the instruction configures the at least one given playback device to”</p> <p>[’033 Patent]</p> <p>[Proposed by Google]</p>	Plain and ordinary meaning; no construction necessary.	“an instruction for the at least one given playback device...”; Instruction means one instruction.
<p>“wherein the instruction comprises an instruction”</p> <p>[’033 Patent]</p> <p>[Proposed by Google]</p>	Plain and ordinary meaning; no construction necessary.	Indefinite

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